

Central Valley Regional Water Quality Control Board

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RESPONSE TO COMMENTS ON DRAFT WASTE DISCHARGE REQUIREMENTS, FORWARD LANDFILL, SAN JOAQUIN COUNTY

Central Valley Water Board staff has review your comments regarding Forward Landfill Draft Waste Discharge Requirements and we have the following responses:

WDRs

Comment 1: Page 3, 11th row – Suggest adding FU-13 to the FU-03 to FU-10 row.
Response: The suggested change has been made.

Comment 2: Page 5, Item 17 – Suggesting adding cannery rinsate muds to the materials that may be air-dried on the bermed, compacted clay pad.
Response: The suggested change has been made.

Comment 3: Page 8, Item 26 – Suggest modifying the first sentence as follows:
Facility Specification C.7 requires that the Discharger Operates the Class II impoundments such that on October 15 of each year a freeboard of at least 4.73 feet and of at least 5.51 feet exists in WMU F-North and WMU F-West, respectively. This corresponds to a two feet freeboard plus the calculated rise in liquid level associated with an average annual storm season.
Response: The suggested change has been made.

Comment 4: Page 10, Item 35 – Suggest that the words “native soil” be replaced with “uppermost aquifer.” This modification will make this item consistent with Page 2, Item 5 of the current WDRs (R5-2003-0049).
Response: The suggested change has been made.

Comment 5: Page 12, Item 49 – Suggest modifying table to include sampling frequency for the wells.
Response: No change was made to the proposed Order, sampling frequency is specified elsewhere in the MRP.

Comment 6. Page 13, Item 50 – Suggest modifying the paragraph as follows:
In recent years, lysimeters at new units have not been sampled on a regular basis due to reasons including a lack of liquid available for sampling. This Order requires quarterly monitoring of all currently existing and any future lysimeters if liquid is available.
Response: Finding 50 was modified to add: “if liquid is available” at the end of the last sentence.

Comment 7. Page 24, Item 107 - Suggest that the second sentence be modified as follows:
A Notice of Determination was filed by the RWQCB following Board adoption of these WDRs in accordance with the California Environmental Quality Act. (Public Resources Code Section 21000 et seq) and CEQA guidelines (Title 14, section 15000 et seq.).

Response: This comment forwarded to our attorney for consideration, but this change has not been made at this time.

Comment 8. Page 27, Item 7 – Suggest the following wording is added at the end of the last sentence in the paragraph:

The annual total nitrogen load shall not exceed 300 pounds per acre, unless a higher loading rate can be justified based on crop uptake.

Response: The suggested change has been made.

Comment 9. Page 29, Item 7 – Suggest the sentence be modified as follows:

The minimum freeboard on October 15th of each year shall be 4.73 feet for WMU F-North and 5.51 feet for WMU F-West.

Response: The suggested change has been made.

Comment 10. Page 37, Item H – Suggest that the due date for the Compost Facility demonstration report is modified to be subsequent to the date of adoption of these WDRs. Also, the revised composting regulations have not been through the final rulemaking process. Therefore, we suggest that the due date for the Compost Facility Demonstration Report be modified to 1 February 2015.

Response: The due date for the Compost Facility demonstration report has been changed to 1 February 2015.

MRP

Comment 11. Page 2, Item A.1 – There are no background deep zone wells for the Austin Road Unit; suggest changing the status of well AMW-7 to an Austin Road Deep Zone Detection Well, Also, suggest adding the sampling frequency of the wells to this table

Response: AMW-7 has been changed to Deep Zone Detection Well, sampling frequency is shown elsewhere in the MRP.

Comment 12: Page 3, Item A.1, second paragraph, line 6, suggest changing “extend” to “extent”.

Response: The suggested change has been made.

Comment 13: Page 3 Item A.1, fifth paragraph. Suggest changing Table VI to Table VIII.

Response: The suggested change has been made.

Comment 14: Page 5, Item A.3 – With the exception of sumps F-North (Forward Pond) and F-West (Austin Pond), leachate collected from the sumps is pumped out to evaporation ponds weekly. The Forward Pond is the leachate monitoring point for WMU a and WMU D series sumps, while the Austin Pond is the leachate monitoring point for WMU FU series sumps. Suggest replacing the monitoring points with the appropriate leachate pond.

Response: Liquid in Forward and Austin Ponds is from several sources including leachate sumps, cannery rinsate, stormwater, etc. and sampling the ponds only does not tell us much about leachate generated by the various WMUs. Leachate sumps are sampled annually to keep costs reasonable. No change to the Order will be made.

Comment 15: Page 5, Item A.3, 3rd Paragraph (below the monitoring point table) – Suggest replacing the paragraph as follows:

All LCRS sumps shall be inspected for the presence of leachate, and total flow and flow rate shall be recorded in accordance with the frequencies listed in Table III. If leachate is detected in a previously dry sump, the discharger shall verbally notify Central Valley Water Board staff within seven days and shall immediately sample and test the leachate for Field and Monitoring Parameters listed in Table III. Leachate samples from the surface impoundments (Forward Pond and Austin Pond) shall be collected for electrical conductivity, pH, Monitoring Parameters, and 5-year Constituents of Concern in accordance with the frequencies listed in Table III.

Response: The 3rd paragraph has been changed to read as follows: “All LCRS sumps shall be inspected monthly for the presence of leachate, and total flow and flow rate shall be recorded in accordance with the frequencies listed in Table III. If leachate is detected in a previously dry sump, the Discharger shall verbally notify Central Valley Water Board staff within **seven days** and shall immediately sample and test the leachate in the sump for Field and Monitoring Parameters listed in Table III. Leachate in the LCRS sumps shall be sampled for all parameters and constituents in accordance with the frequencies listed in Table III. All LCRS sumps shall be analyzed for the 5-year COCs specified in Table III every five years, beginning again in **2018.**”

Comment 16: Page 7, Item A.5 – Suggest changing “Table II” to Table VI.

Response: The suggested change has been made.

Comment 17: Page 9, Item A.8 – Suggest the following wording is added at the end of the first sentence in the first paragraph: “The Discharger shall collect daily wet weight and weekly composite waste samples from each cannery waste source unless less frequent composite sampling can be justified.”

Response: The following was added to the paragraph in question: “Less frequent composite sampling may be permitted if justified and approved by Water Board staff.”

Comment 18: Page 9, Item A.8 – Suggest the following wording is added to the first sentence of the second paragraph: “Land application areas shall be inspected prior to discharge of putrescible cannery solids and non-putrescible rinsate/wastewater, and observations from those inspections shall be summarized for inclusion in the quarterly monitoring reports.”

Response: The suggested change has been made.

Comment 19: Page 10, Item A.9 – Surface impoundments are not listed. Suggest replacing the paragraph as follows: “Surface impoundments F-North (Forward Pond) and F-West (Austin Pond) shall be monitored for the Parameters listed in Table V. If liquid is present, a sample shall be analyzed for the parameters in Table III.”

Response: The paragraph has been changed to read: The surface impoundments F-North and F-West, shall be monitored monthly for the parameters in Table V and the results shall be reported quarterly. Surface impoundment sumps shall be inspected monthly for the presence of liquid. If liquid is detected, a sample shall be analyzed for the parameters in Table III and reported quarterly.

Comments 20, 21, 25, 27 and 30: Refer to correcting Table designations.

Response: The suggested changes have been made.

Comments 22, 23, 24, 26, 28 and 29 refer to timing of the 5-year Constituent of Concern sampling.

Response: The suggested changes have been made.

Comment 31: Page 27, Table V – Leachate sampling is discussed in Table III, suggest removing Dissolved Oxygen from Field Parameters or adding it as a quarterly Field Parameter in Table III.

Response: Dissolved Oxygen was removed from Field Parameters in Table V, Surface Impoundment Monitoring.

Herst and Associates Comments

Comment 1: WDRs Page 14, Finding 49 (Austin Road, Shallow Zone Detection): Re-designate AMW-13 & -14 as corrective action wells.

Response: The suggested change has been made.

Comment 2: WDRs Page 14, Finding 49 (Austin Road, Shallow Zone, Corrective Action): Re-designate AMW-5R as Detection.

Response: The suggested change has been made.

Comment 3: WDRs Page 14, Finding 49, Austin Road Deep Zone: Re-designate AMW-7 as Detection.

Response: The suggested change has been made.

Comment 4: M&RP Page 2, Part A.1: Apply comments 1 – 3 to Part A.1 of MRP.

Response: The suggested changes have been made.

Comment 5: M&RP Page 20, Part C.4: Add concentration limits for AMW-12 and AMW-7.

Response: The suggested changes have been made.

If you have any questions, please call me at (916) 464-4614 or via email at ratkinson@waterboards.cs.gov.

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